

THE LAW OFFICES OF
J O S E P H A . B O N D Y

JOSEPH A. BONDY

STEPHANIE SCHUMAN
(OF COUNSEL)

1776 BROADWAY
SUITE 2000
NEW YORK NY 10019
TEL 212.219.3572
FAX 212.219.8456
JOSEPHBONDY@MAC.COM

January 17, 2019

Hon. J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
Courtroom 706
New York, NY 10007

Re: United States v. Lev Parnas, et. al., 19-cr-725 (JPO)

Dear Judge Oetken:

Mr. Parnas respectfully requests a third modification of the Protective Order governing discovery to allow him to produce the following additional items to the United States House of Representatives' Permanent Select Committee on Intelligence (HPSCI):

- (1) Materials produced by Apple, Inc. from the defendant's iCloud account in response to a October 21, 2019 warrant, stamped USAO_LP_00000021—
USAO_LP_00000031;

Review of these items is essential to the Committee's ability to corroborate the strength of Mr. Parnas's potential testimony.

The Government objects to Mr. Parnas producing these materials to HPSCI.

Thank you for consideration of this application.

Respectfully submitted,

_____/S/_____
Joseph A. Bondy
Counsel to Lev Parnas

c: All Counsel